



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

August 13, 2020

**BY CM/ECF**

The Hon. J. Paul Oetken  
United States District Court for the  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Segovia-Landa et al.*, 20 Cr. 287 (JPO)**

Dear Judge Oetken:

The Government writes to respectfully request a 45-day adjournment of the conference scheduled for August 13, 2020 in the above-referenced matter, and to request an order excluding time under the Speedy Trial Act until the new date for the conference. The defendants each consent to this request.

On February 11, 2020, the defendants were arrested following a series of narcotics transactions. On February 12, 2020, the defendants were charged in a Complaint with one count of conspiracy to distribute heroin, fentanyl, and methamphetamine, in violation of 21 U.S.C. §§ 841(b)(1)(A) and 846. Following presentments held on the same day, defendants Marco Segovia-Landa, Ledif Perez-Perez, and Jose Rivera were ordered detained. Defendant Lisandy Joaquin Ortiz was released subject to bail conditions. On June 3, 2020, the grand jury returned Indictment 20 Cr. 287 charging each defendant with one count of conspiracy to distribute heroin, fentanyl, methamphetamine, and cocaine, in violation of 21 U.S.C. §§ 841(b)(1)(A) and 846. Each of the defendants has been arraigned in the Magistrate Court.

The bulk of the discovery in this matter has been produced. The Government expects to make one supplemental production this week. Furthermore, the Government obtained a warrant to seize and search various cellphones recovered during the charged transactions, and will produce discovery related to the cellphone extractions as they become available.

The Government seeks a 45-day adjournment of the pretrial conference in this matter. An adjournment will allow the defendants and their counsel additional time to review discovery under challenging circumstances, including the fact that three of the defendants are in custody, and permit the parties additional time to discuss resolutions to this matter. Counsel for each of the defendants has consented to this request.

The Government further requests an order excluding time under the Speedy Trial Act from August 13, 2020, until the new date for the pretrial conference. The ends of justice served by

